

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CIVIL ACTION FILE NO. 5:19-CT-3131-BO

GREG H. JOHNSON,

Plaintiff,

v.

M. MEADOWS, et al.,

Defendants.

**DEFENDANT BRAMBLE'S
PROPOSED VERDICT SHEET**

The Defendant Edward E. Bramble, by and through his undersigned counsel, herewith provides the Court with the following Proposed Verdict Sheet:

1. Do you find that Plaintiff established by a preponderance of the evidence that Defendant Morris Meadows used force against the Plaintiff maliciously and sadistically for the very purpose of causing Plaintiff harm on September 2, 2018?

Yes ____

No ____

If you answered "No" to Question #1 above, then you have found for Defendant Morris Meadows and you should not proceed any further. If, on the other hand, you answered "Yes," proceed to Question #2 below.

2. As a result of Defendant Meadow's actions, did Plaintiff suffer some injury?

Yes ____

No ____

If you answered "No" to Question #2 above, then you have found for Defendant Morris Meadows and you should not proceed any further. If, on the other hand, you answered "Yes," proceed to Question #3 below.

3. Did Defendants Edward Bramble, Timmie Hicks, and/or Nichole Leszczak, while acting under color of state law, violate Plaintiff's Eighth Amendment rights by demonstrating deliberate indifference to his injuries?

Defendant Bramble Yes _____ No _____

Defendant Hicks Yes _____ No _____

Defendant Leszczak Yes _____ No _____

If you answered "No" to Question #3 above, then you have found for Defendant Edward Bramble, Timmie Hicks and/or Nichole Leszczak and you should not proceed any further. If, on the other hand, you answered "Yes," proceed to Question #4 below.

4. Did the plaintiff suffer (disfigurement)(loss of use of part of the body)(permanent injury) that was proximately caused by the conduct of Defendants Edward Bramble, Timmie Hicks and/or Nichole Leszczak that was in reckless disregard of the rights of others, grossly negligent or intentional, with malice?

Defendant Bramble Yes _____ No _____

Defendant Hicks Yes _____ No _____

Defendant Leszczak Yes _____ No _____

If you answered "No" to Question #5 above, then you have found for Defendant Edward Bramble Timmie Hicks and/or Nichole Leszczak and you should not proceed any further. If, on the other hand, you answered "Yes," proceed to Question #5 below.

5. Did Plaintiff suffer damages from the conduct of Defendants Edward Bramble, Timmie Hicks and/or Nichole Leszczak?

If YES, what is the dollar amount of Plaintiff's damages?

Defendant Bramble \$ _____

Defendant Hicks \$ _____

Defendant Leszczak \$ _____

If NO, award nominal damages in the amount of \$1.00:

Defendant Bramble \$ _____

Defendant Hicks \$ _____

Defendant Leszczak \$ _____

6. Is Plaintiff entitled to punitive damages?

Yes _____ No _____

If YES, what is the dollar amount of punitive damages?

Defendant Bramble \$ _____

Defendant Hicks \$ _____

Defendant Leszczak \$ _____

SO SAY WE ALL.

DATE _____

Jury Foreperson Signature

This the 12th day of September, 2022.

LAW OFFICES OF
ROBERT O. CRAWFORD III, PLLC

By /s/ Robert O. Crawford III
Robert O. Crawford III
N.C. State Bar No. 12373

4242 Six Forks Road, Suite 1550
Raleigh, NC 27609
Telephone: 984-220-8280
Facsimile: 800-878-8638
Email: bob@crawfordlaw.biz

ATTORNEY FOR DEFENDANT
EDWARD E. BRAMBLE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Civil Action No.: 5:19-CT-03131-BO

GREG H. JOHNSON,

Plaintiff,

v.

M. MEADOWS, E. BRAMBLE,

N. LESZCZAK, T. HICKS,

Defendants.

CERTIFICATE OF SERVICE

It is hereby certified that on September 12, 2022, the foregoing DEFENDANT BRAMBLE'S PROPOSED VERDICT SHEET was filed with the Clerk of Court using the CM/ECF system which will provide electronic notice to the following:

John M. Kirby
Law Offices of John M. Kirby, PLLC
4801 Glenwood Avenue, Suite 300
Raleigh, NC 27612
Counsel for Defendant Meadows

Bradley D. Brecher
Assistant Attorney General
N.C. Department of Justice
P.O. Box 629
Raleigh, NC 27602-0629
Counsel for Defendants Hicks and Leszczak

I further certify that I have on this date served a copy upon the Plaintiff, a non-CM/ECF participant, via regular United States mail, first class postage prepaid, and addressed as follows:

Greg H. Johnson
OPUS No. 0737463
Granville Correctional Institution
P.O. Box 2500
Butner, NC 27509

LAW OFFICES OF
ROBERT O. CRAWFORD III, PLLC

By /s/ Robert O. Crawford III
Robert O. Crawford III
N.C. State Bar No. 12373

4242 Six Forks Road, Suite 1550
Raleigh, NC 27609
Telephone: 984-220-8280
Facsimile: 800-878-8638
Email: bob@crawfordlaw.biz